



State of Utah

Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
Richard W. Sprott
Director

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

DAQE-IN0237011-06

August 29, 2006

Reginald Soepnel
Managing Director
PacifiCorp - Hunter Power Plant
3 miles South Highway 10
P.O. Box 569
Castel Dale, Utah 84513

Dear Mr. Soepnel:

Re: Intent to Approve: Expand and Clarify Opacity Limit During Periods of Startups and Shutdowns,
Emery County – CDS A; NSPS; PSD; Title IV; Title V Major; HAPs
Project Code: N0237-011

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Ms. Milka M. Radulovic. She may be reached at (801) 536-4232.

Sincerely,

Rusty Ruby, Manager
New Source Review Section

RR:MR:kw

cc: Southeastern Utah District Health Department

Mike Owens, EPA Region VIII

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Expand and Clarify
Opacity Limit During Periods of Startups
and Shutdowns**

**Prepared By: Milka M. Radulovic, Engineer
(801) 536-4232
Email: milkar@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0237011-06

Date: August 29, 2006

PacifiCorp - Hunter Power Plant

**Source Contact
Eugene Marshall
(801) 220-2235**

**Richard W. Sprott
Executive Secretary
Utah Air Quality Board**

Abstract

PacifiCorp has submitted a Notice of Intent (NOI) to expand and clarify the language for the existing opacity limits during startups and shutdowns for the Unit #1, Unit #2 and Unit #3 boilers located at their Hunter Power Plant. Hunter Plant is located near Castle Dale in Emery County, Utah. Emery County is an attainment area of the National Ambient Air Quality Standards (NAAQS) for all pollutants. New Source Performance Standards (NSPS) Subparts A, D, and Da apply to this source. National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations do not apply to this source. Title V and Title IV apply to this source. PacifiCorp is requesting that additional enforceable language for the emission limitations for startups, shutdowns and malfunctions be incorporated in the Title V operating permit. This project will not result in any emissions change.

Annual emissions for this plant are currently calculated at the following potential to emit totals: PM = 2,525, PM₁₀ = 1,789, NO_x = 26,980, SO₂ = 10,253, CO = 1,305, VOC = 157.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Salt Lake Tribune and Deseret News on September 1, 2006. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This Approval Order (AO) applies to the following company:

Site Office

PacifiCorp Hunter Plant
3 miles South Highway 10
P.O. Box 569
Castle Dale, Utah 84513

Corporate Office Location

PacifiCorp
1407 West North Temple
Salt Lake City, Utah 84140

Phone Number (435) 748-5114
Fax Number (435) 748-6579

(801) 220-2235
(801) 220-4307

The equipment listed in this AO shall be operated at the following location:

Approximately three (3) miles south of Castle Dale, Utah on State Highway 10.
Emery County

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,335.8 kilometers Northing; 497.8 kilometers Easting; Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO or in applicable NSPS and/or NESHAP and/or MACT standards, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for a minimum of five year periods.
6. PacifiCorp shall operate the Hunter Power Plant in accordance with the terms and conditions of this AO and AOs listed in the Condition 7, which was written pursuant to PacifiCorp's Notice of Intent submitted to the Division of Air Quality (DAQ) on April 14, 2006 and additional August 23, 2006.
7. This AO shall replace the AO DAQE-1089-97 dated December 18, 1997 and shall be used in conjunction with the AO(s) dated April 3, 1986 (Unit #1), July 27, 1987 (Unit #2), and August 31, 1983 (Unit #3), and additional letters dated: October 27, 1983, and September 6, 1985.

Limitations

8. Emissions to the atmosphere at all times from the indicated emission point(s) shall not exceed the following rates and concentrations:

Source: PacifiCorp Hunter Plant

Pollutant	Limitation
Particulate Matter	0.05 lb/MMBtu (6-hour averaging period)
SO ₂	0.21 lb/MMBtu (12-month rolling average)
NO _x	0.45 lb/MMBtu (12-month rolling average)
Pollutant	Limitation
Particulate Matter	0.05 lb/MMBtu (6-hour averaging period)

SO ₂	0.21 lb/MMBtu (12-month rolling average)
NO _x	0.45 lb/MMBtu (12-month rolling average)
NO _x	0.70 lb/MMBtu (3-hour averaging period)
Pollutant	Limitation
Particulate Matter	0.02 lb/MMBtu (6-hour averaging period)
SO ₂	0.10 lb/MMBtu (30-day rolling average)
NO _x	0.46 lb/MMBtu (30-day rolling average)

9. Visible emissions shall not be discharged to the atmosphere from the Hunter Unit #1, Unit #2 and Unit #3 boiler stacks at a rate exceeding 20 percent opacity ¹. During periods of startup and shutdown Condition 10 and Condition 12 shall apply.

Compliance with visible emission limit shall be determined by a continuous opacity monitor. The monitoring system shall comply with all applicable sections of R307-170, UAC; and 40 CFR 60, Appendix B.

¹ *This limitation replaces existing limitation of 20%.*

10. Hunter plant shall implement, and maintain a written startup and shutdown work practice plan (Plan) that describes, in detail, procedures for operating and maintaining the Unit #1, #2 and #3 main boilers, including associated air pollution control and monitoring equipment, during periods of startup and shutdown.

A.

Unit #1

- 1) For Opacity startup begins with introduction of fuel into the boiler and ends when the unit is in the stable operation and when the following parameters are met (1) the temperature of both outlets of the electrostatic precipitators (ESP) reaches 220 °F, and (2) less than 10 percent of the boiler heat input furnished by fuel oil.
- 2) For Opacity shutdown begins when the following parameters are met (1) the temperature of both outlets of the electrostatic precipitator (ESP) drops below 220°F, and (2) greater than 10 percent of the boiler heat input is being furnished by fuel oil and ends when the fuel is shutoff to the boiler.

Unit #2

- 3) For Opacity startup begins with introduction of fuel into the boiler and ends when the unit is in the stable operation and when the following parameters are met (1) the temperature of both outlets of the electrostatic precipitators (ESP) reaches 220 °F, and (2) less than 10 percent of the boiler heat input furnished by fuel oil.
- 4) For Opacity (PM10), shutdown begins when the following parameters are met (1) the temperature of both outlets of the electrostatic precipitator

(ESP) drops below 220°F, and (2) greater than 10 percent of the boiler heat input is being furnished by fuel oil and ends when the fuel is shutoff to the boiler.

Unit #3

- 5) For Opacity startup begins with introduction of fuel into the boiler and ends when the unit is in the stable operation and when the following parameters are met (1) the temperature of both outlets of the baghouse reaches 220 °F, and (2) less than 10 percent of the boiler heat input furnished by fuel oil.
 - 6) For Opacity (PM10), shutdown begins when the following parameters are met (1) the temperature of both outlets of the baghouse drops below 220°F, and (2) greater than 10 percent of the boiler heat input is being furnished by fuel oil and ends when the fuel is shutoff to the boiler.
- B. Hunter plant shall keep records which demonstrate that Hunter plant complied with the general duty to minimize emissions during periods of startup and shutdown, as set forth in Condition 12. These records shall include the time and date of occurrence and duration of each startup and shutdown as well as any other pertinent information.
- C. Bypass of associated air pollution control equipment shall only be used to prevent loss of life, personal injury, or severe property damage.

Federal Limitations and Requirements

11. In addition to the requirements of this AO, all provisions of 40 CFR 60, New Source Performance Standards (NSPS) Subparts A, 40 CFR 60.1 to 60.18, Subpart D, 40 CFR 60.40 to 60.46 (Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971), Subpart Da, 40 CFR 60.40(a) to 60.49a (Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978), and Acid Rain program provisions of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78, apply to this installation.

Records & Miscellaneous

12. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source and records required in Condition 10. All maintenance performed on the equipment authorized by this AO shall be recorded.
13. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.

14. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

Annual emissions for this source (Hunter Plant) are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A)	TSP	2,525
B)	PM ₁₀	1,789
C)	SO ₂	10,253
D)	NO _x	26,980
E)	CO	1,305
F)	VOC	157

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Rusty Ruby, Manager
New Source Review Section